

Before The
Federal Communications Commission
Washington, D.C. 20554

ORIGINAL
DOCKET FILE COPY ORIGINAL
RECEIVED
DEC 17 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

To: The Commission

COMMENTS ON MSTV PROPOSED DTV TABLE OF ALLOTMENTS

West Central Illinois Educational Telecommunications Corporation (known as "CONVOCOM"), operator of a regional noncommercial educational television network serving west central Illinois, by its counsel, provides these comments on the modified DTV table of allotments, as proposed by the "Ex Parte Submission Based on New Technical Discoveries to Help the Commission Improve the DTV Table of Allotments/Assignments Submitted by the Association for Maximum Service Television, Inc. and Other Broadcasters," filed November 20, 1997 (the "MSTV Submission").^{1/} While sympathetic to the concerns underlying MSTV's proposed changes in the Table, CONVOCOM opposes one particular change--the proposed substitution of DTV Channel 65 for Channel 53 at Station WGBO(TV), NTSC Channel 66, Joliet, Illinois. The use of DTV Channel 65 at Joliet could very well deprive viewers in Springfield, Illinois, the State Capital, of their only off-air NTSC public television service.

^{1/} By Public Notice dated December 2, 1997, the Commission provided until December 17, 1997, for interested parties to comment on the MSTV Submission.

004

CONVOCOM is licensee of noncommercial educational television stations WSEC, Jacksonville, WMEC, Macomb, and WQEC, Quincy, all in Illinois. CONVOCOM is also licensee of TV Translator station W65BV, Springfield, Illinois, which operates on reserved NTSC Channel *65 to provide the only off-air public television service to Springfield and environs. Since January 29, 1996, CONVOCOM also has had a timely application pending for a noncommercial educational television station on Channel *65 at Springfield (no file number assigned).

The DTV Table of Allotments adopted by the Commission in the *Sixth Report and Order* in MM Docket No. 87-268, FCC 97-115 (released April 21, 1997) ("*Sixth R&O*"), did not specify the use of DTV Channel 65 in Illinois or any surrounding communities that might affect the use of NTSC Channel *65 in Springfield. CONVOCOM believes that the Commission was cognizant of CONVOCOM's application to activate a new public TV station on that channel and chose to protect that application, as well as the existing TV Translator station operating on that channel.

Unfortunately, the MSTV Submission now proposes a change in the table to allot DTV Channel 65 as a substitute for DTV Channel 53 at Joliet, Illinois. Due to the proximity of Joliet to Springfield, this change would undoubtedly prevent the Commission from granting CONVOCOM's pending application for Channel *65. It might also adversely affect the existing TV Translator operation on that channel which, as noted above, supplies the only off-air public television to the capital city of the State of Illinois.

For this reason, and to this extent, CONVOCOM opposes the MSTV Submission and urges the Commission to accommodate the technical concerns legitimately raised by MSTV in some other way.

Respectfully submitted,

WEST CENTRAL ILLINOIS
EDUCATIONAL
TELECOMMUNICATIONS
CORPORATION

By: Todd D. Gray
Todd D. Gray
Its Attorney

Dow, Lohnes & Albertson, pllc
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, D.C. 20036-6802
202-776-2571

December 17, 1997

CERTIFICATE OF SERVICE

I certify that I have this 17th day of December, 1997, served copies of the foregoing "Comments on MSTV Proposed DTV Table of Allotments" by First Class U.S. Mail or by hand delivery upon the following:

Richard M. Smith*
Chief, Office of Engineering and Technology
Federal Communications Commission
2000 M Street, N.W.
Washington, D.C. 20554

Clay Pendarvis, Esq.*
Chief, TV Branch
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Jonathan D. Blake, Esq.
Ellen P. Goodman, Esq.
Covington & Burling
1201 Pennsylvania Avenue, N.W.
P.O. Box 7566
Washington, D.C. 20044-7566
Counsel for MSTV


Nadine Curtis

*denotes service by hand delivery